

# Greenberg Traurig

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November 22, 2005

## VIA ELECTRONIC FILING

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation in CC Docket Nos. 96-45, 98-171,  
92-237, 99-200, 95-116, 98-170, and NSD File No. L-00-72

Dear Ms. Dortch:

On November 22, 2005, F. J. Pollak, President and Chief Executive Officer of TracFone Wireless, Inc., and I met with Commissioner Michael Copps and Jessica Rosenworcel, Legal Advisor to Commissioner Copps.

During the meeting, we reiterated positions TracFone has taken in its filed comments and prior ex parte submissions in the Universal Service Contribution Methodology proceeding. Specifically, we discussed why replacement of a revenues-based contribution methodology with a methodology based on working telephone numbers would produce significant dislocations to providers of prepaid wireless services and consumers of the services provided by prepaid wireless carriers. We also discussed the importance of addressing the unique circumstances of the prepaid wireless industry in any plan which revises the contribution methodology. In this regard, we referred to and provided Commissioner Copps and Ms. Rosenworcel with a copy of an ex parte letter filed with the Commission on October 21, 2005 in these proceedings. In that letter, TracFone proposed that providers of interstate telecommunications service who have no billing and collection relationship with their customers, such as prepaid wireline calling card companies and prepaid wireless carriers, continue to have their contributions to the Universal Service Fund based on their interstate telecommunications service revenues.

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Pursuant to Section 1.1206(b) of the Commission's rules, this notice is being filed electronically in the above-captioned dockets. If you have questions regarding this matter, please communicate directly with undersigned counsel for TracFone.

Sincerely,

A handwritten signature in black ink, appearing to read 'MFB', with a long horizontal line extending to the right.

Mitchell F. Brecher

cc: The Honorable Michael Copps  
Ms. Jessica Rosenworcel